

(Revised 7/24/2002)

Board Meeting
October 15-16, 2002

Agenda Item
Attachment 1

To request a Time Extension (TE) or Alternative Diversion Requirement (ADR), please complete and sign this form and return it to your Office of Local Assistance (OLA) representative at the address below, along with any additional information requested by OLA staff. When all documentation has been received, your OLA representative will work with you to prepare for your appearance before the Board. If you have any questions about this process, please call (916) 341-6199 to be connected to your OLA representative.

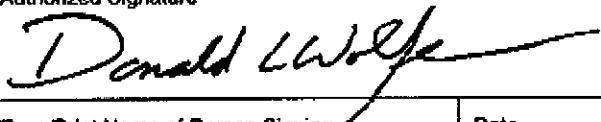
Mail completed documents to:

California Integrated Waste Management Board
Office of Local Assistance, (MS 25)
1001 I Street
PO Box 4025
Sacramento CA 95812-4025

General Instructions:

For a Time Extension complete Sections I, II, III-A, IV-A, and V.

For an Alternative Diversion Requirement complete Sections I, II, III-B, IV-B and V.

Section I: Jurisdiction Information and Certification <i>All respondents must complete this section.</i>			
I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:			
Jurisdiction Name Los Angeles County (Unincorporated Areas)		County Los Angeles County	
Authorized Signature 		Title Assistant Director	
Type/Print Name of Person Signing Donald L. Wolfe	Date 09-19-2002	Phone (626) 458-4014	
Person Completing This Form (please print or type) M. Michael Mohajer		Title Assistant Deputy Director	
Phone (626) 458-3500	E-mail Address mmohajer@ladpw.org		Fax (626) 458-3569
Mailing Address 900 S. Fremont Avenue	City Alhambra	State CA	ZIP Code 91803

Section II—Cover Sheet

This cover sheet is to be completed for each Time Extension (TE) or Alternative Diversion Requirement (ADR) requested.

1. Eligibility

Has your jurisdiction filed its Source Reduction and Recycling Element, Household Hazardous Waste Element, and Nondisposal Facility Element with the Board (must have been filed by July 1, 1998 if you are requesting an ADR)?

☐ No. If no, stop; not eligible for a TE or ADR.

☒ Yes. If yes, then eligible for a TE or ADR.

2. Specific Request and Length of Request

Please specify the request desired.

☒ **Time Extension Request**

Specific years requested 2002, 2003, 2004

Is this a second request? ☒ No ☐ Yes Specific years requested
(Note: Requests for an additional extension will need to address why the jurisdiction's efforts to meet the 50% goal by the end of the first extension were not successful.)

☐ **Alternative Diversion Requirement Request (Not allowed for Regional Agencies).**

Specific ADR requested %, for the years .

Is this a second ADR request? ☐ No ☐ Yes Specific ADR requested %, for the years .

(Note: Requests for an additional ADR will need to address why the jurisdiction's efforts to meet 50% by the end of the first ADR period were not successful.)

Note: Extensions may be requested anytime by a jurisdiction, but will only be effective in the years from January 1, 2000 to January 1, 2006. An original request for a TE/ADR may be granted for any period up to three years and subsequent requests for TE/ADR may extend the original request or be based on new circumstances but the total number of years for all requests cannot total more than five years or extend beyond January 1, 2006.

Section IIIA—TIME EXTENSION

Within this section, discuss your jurisdiction's progress in implementing diversion programs that were planned to achieve 50%. Provide any additional information that demonstrates "good faith effort." The CIWMB shall determine your jurisdiction's progress in demonstrating "good faith effort" towards complying with AB 939. Note: The answers to each question should be comprehensive and provide specific details regarding the jurisdiction's situation.

Attach additional sheets if necessary—please reference each response to the appropriate cell number (e.g., IIIA-1).

- 1. Why does your jurisdiction need more time to meet the 50% goal? Describe why SRRE selected programs did not achieve 50% diversion. Identify barriers to meeting the 50% goal and briefly indicate how they will be overcome.**

Los Angeles County has fully implemented all of the programs listed in its CIWMB-approved SRRE, and additional programs beyond its SRRE, as substantiated in our 2000 Annual Report. The County's programs have been recognized by the CIWMB, NACo, SWANA, APWA, the Federal EPA, and others as being among the best in the State and the nation. In the years since 2000, the County has continued to develop and expand its waste diversion and public education programs and will continue to do so into the future, as discussed herein. Because of the breadth of its programs and their effectiveness at diverting waste, as measured by independent studies of the residential and business sectors of the unincorporated areas of the County conducted in 2000, the County believes that it has fully complied with the requirements of AB 939.

Despite its highly-regarded waste diversion and public education programs, the County is unable to document mathematical achievement of the State's 50 percent waste reduction mandate utilizing the CIWMB's adjustment methodology and the disposal tonnages reported by waste haulers through the Disposal Reporting System. The County firmly believes that hauler misreporting at the landfills/transfer stations is the major barrier that is severely impacting its ability to demonstrate mathematical compliance. This misreporting is attributed to factors such as haulers' efforts to avoid permit fees imposed by the jurisdiction of origin of the waste, circumventing landfill wasteshed restrictions, the need to fulfill contractual obligations, and other factors. The County has made efforts to address this situation, but has had difficulty in obtaining hauler cooperation in improving the accuracy of the disposal tonnages allocated to the County unincorporated areas (see Question IIIA-4 for further discussion). As discussed herein, the County is taking additional action at the local level to address this misreporting.

Waste collection and recycling services in the unincorporated areas outside the six existing Garbage Disposal Districts (GDDs) have historically been provided by private waste haulers under an open-market system. At the time of preparation of the County SRRE, more than 360 permitted waste haulers were operating in the unincorporated areas. A large number of mergers and acquisitions in the waste industry in recent years has reduced the number of permitted haulers to just over 100 and has impacted the cost and quality of the services provided. In addition, this existing system has been slow in responding to changes in laws and regulations and has limited the County's ability to obtain accurate disposal data. In order to ensure quality and cost-effective waste collection, recycling, and green waste services to residents and businesses in the unincorporated areas and to assist the County in improving the accuracy of the reported disposal tonnages, the County has begun the process of overhauling the existing open-market solid waste collection system in its unincorporated areas. On September 2, 1997, and June 16, 1998, the County issued the State-mandated five-year advance notice to waste haulers operating in the Lennox area and the remaining unincorporated communities operating under an open-market system, respectively, that the County intends to replace the existing system after the end of the five year period. The County thereupon consulted with the waste industry and other stakeholders in the formulation of options and recommendations for overhauling the existing system. On May 22, 2001, the County Board of Supervisors approved the February 2001 Solid Waste Collection System - Option Analysis report (Attachment III). Implementation of the plan of action discussed in that report, which includes the establishment of a franchise system, will ensure quality and cost-effective services to residents and businesses in the unincorporated areas and will assist the County in improving the accuracy of the reported disposal tonnages.

The County will continue to implement new and expanded waste diversion and public education programs, including the gradual implementation of automated refuse, recycling, and green waste services in upcoming franchises and GDD contracts, imposition of reporting requirements at disposal facilities as a part of upcoming land use permits for facilities located in the unincorporated areas, and other programs as discussed herein. Note however that many of these, such as establishing a franchise system, cannot be done immediately due to constraints imposed by State law. A Time Extension is being requested to allow the County to phase in the franchise system (upon the end of the five-year hauler continuation rights provided in State law) to assist the County in obtaining more accurate waste origin data and make structural changes in the waste collection and recycling services to further increase diversion. In addition, the Time Extension will allow the County time to observe measurable results from the construction and demolition debris recycling program being implemented by the County in response to increased development activity resulting from improved economic conditions in the region (C&D debris recycling was not included as a program in the County's CIWMB-approved SRRE).

The County looks forward during the Time Extension period to the actions the CIWMB is undertaking to improve the diversion measurement system. These actions will significantly assist the County in improving the accuracy the reported disposal tonnages and thereby substantiate its mathematical compliance with the AB 939 mandates.

2. Why does your jurisdiction need the amount of time requested? Describe any relevant circumstances in the jurisdiction that contribute to the need for a Time Extension.

The County requests a Time Extension through 2004 to allow time for the County to overhaul the open-market waste collection system discussed at length in Question IIIA-1 above, to implement automated refuse, recycling, and green waste collection services in upcoming franchises and GDD contracts, and to impose new reporting requirements at disposal facilities as part of upcoming land use permits discussed in Section IV-A later herein. These three major actions cannot be implemented immediately due to a number of barriers, such as State law (e.g., five-year hauler continuation rights), contractual agreements, land use entitlements, etc., and will take approximately three years to fully implement and/or evaluate. In addition, the County needs time to complete the implementation and evaluation of its construction & demolition debris recycling program, including a proposed Construction & Demolition Debris Recycling Ordinance which is planned to be submitted for approval by the Board of Supervisors later in 2002 and will incorporate an extensive public outreach and education campaign as part of its implementation. Initial monitoring and evaluation of this Ordinance will need to be conducted through July 2004.

3. Describe your jurisdiction's Good Faith Efforts to implement the programs in its SRRE.

The County of Los Angeles has certainly made a "good faith effort" by fully implementing all of the programs listed in its CIWMB-approved SRRE and additional programs beyond its SRRE. Examples of these programs include:

- A residential recycling program that was phased-in beginning October 1989. By 1995, all unincorporated area single-family and duplex residences were receiving curbside recycling services. The County mandated, and continues to mandate, haulers to deliver recycling bins to all single-family and duplex residences outside the GDDs, and to collect the recyclables in unlimited amounts at least once per week.
- A green waste program that was phased-in beginning in 1990. By 1999, all unincorporated area single-family and duplex residences were receiving separate green waste collection services. The County mandated, and continues to mandate, haulers to deliver separate green waste containers to all single-family and duplex residences outside the GDDs, and to collect the green waste in unlimited amounts at least once per week.
- Since June 1, 1995, the County has mandated waste haulers to provide recycling and green waste services to their multi-family residential customers who were not already receiving the services.
- Within the GDDs, the County requires its contractors to deliver the recycling and green waste containers and collect the recyclables and green waste at least once per week in unlimited amounts from all single-family and duplex residences. The County also requires its contractors to provide recycling and green waste services and the containers to all multi-family and commercial/industrial customers upon request (An earlier contract for the Athens GDD had required its contractor to provide recycling/green waste containers to all multi-family customers, however, the program was unsuccessful due to limited response by the customers. To solve this problem, the County moved to implement MRF processing of commingled materials in two GDDs, see below).

[Note: Some County unincorporated areas, both within and outside the GDDs, are now receiving commingled collection services with recyclables and green waste recovered at MRFs.]

- A Countywide multimedia public outreach component of the residential recycling program which reaches out to all of the ten million residents of the unincorporated areas and 88 cities (the largest in the nation).
- The largest household hazardous waste (HHW) management program in the nation, which serves residents from the unincorporated areas and 88 cities. As an element of its HHW program, the County provides approximately \$2 million annually to the City of Los Angeles to conduct hazmobile events within the City's boundaries.
- A business recycling program, which was initiated in 1994 and is ongoing, whereby County staff or its contractor conduct free site visits to promote recycling and help businesses develop customized recycling programs. Other features of this program include a business recycling resources website (www.businessrecycling.com), a newsletter, and an award program to provide incentives and recognition to businesses establishing or expanding recycling programs. Over 2,000 unincorporated area businesses received site visits from the County's personnel or its business recycling consultants during the period of January 1998 through December 2000.
- A C&D debris recycling program for County-sponsored projects which was established in 2001. The County has developed Debris Recycling Specifications which are incorporated into all County contracts administered by the Department of Public Works (which include all capital and public works projects) whenever the projects are estimated to generate ten tons or ten cubic yards of debris (whichever is less) or more.
- A Countywide yard waste management program initiated in 1990 which offers free composting and vermiculture classes on weekends and maintains demonstration centers located throughout the County.
- An integrated waste tire recycling program initiated in late 1992 and currently combining free collection events, recycled tire demonstration projects, and the recycling of millions of waste tires through the use of rubberized asphalt concrete and rubberized emulsion aggregate slurry in thousands of lane miles of roadway construction.
- A County recycled product procurement program initiated in 1990 which currently provides price references and/or cooperative purchasing with cities that have resulted in over 125,000 cases (as of the year 2000) of recycled-content office paper being purchased, as well as the use of re-refined oil lubricants by County departments.
- A County departmental recycling program initiated in 1990. In the year 2000 alone, it recycled over 2,800 tons of office paper, as well as toner cartridges, metal, plastics, cardboard, newspapers, books, green waste, etc.

The County's waste diversion and public education programs have been recognized by the CIWMB, NACo, SWANA, APWA, the Federal EPA, and others as being among the best in the State and the nation. The County does not rest on its past success however — it continually looks for new and more effective ways to accomplish its mission. In the years since 2000, the County has continued to develop new programs and expand/enhance its existing waste diversion and public education programs and will continue to do so into the future.

4. Provide any additional relevant information that supports the request.

As has been communicated to the CIWMB since 1999, the County believes that in a metropolitan area as complex as Los Angeles County, it is very difficult (maybe impossible) to devise a tracking system that accurately identifies the origin of the solid waste by jurisdiction. To devise such a system, major logistical, structural, educational, and motivational obstacles must be overcome. Errors are introduced into the system at every stage, due to deficiencies in the information gathering procedures at the solid waste facilities' gates, language barriers, lack of knowledge, personal reasons motivating those making the deliveries to the disposal/transfer facilities, etc. These errors are compounded under the current measurement system due to the lack of standards for collecting the information as well as enforcement and due process provisions. These deficiencies have severely impacted the unincorporated area disposal tonnages, particularly in the years following 1998.

Figure 1 (see Attachment I) shows the unincorporated area disposal tonnages were either steady or declined from 1995-1998, but as the year 2000 neared, the tonnages took a major jump—with the year 2000 tons being over 30 percent higher than in 1997. These significant increases are inconsistent with the changes in demographic and economic conditions in the unincorporated areas for the same period and resulted in a drop in the diversion rate estimate, based on the DRS, to 30 percent in 2000 compared to 40 percent (also based on the DRS) for both 1998 and 1999 -- in 1999 the County completed implementation of its residential green waste program and expected significant reductions in the disposal tonnages. The County believes significant quantities of solid waste are being wrongly reported as unincorporated area waste. Attachment II provides sample correspondence substantiating this misallocation and the difficulties faced by the County in obtaining hauler cooperation. This problem is further substantiated by the results of a random load verification program conducted at the Puente Hills Landfill in cooperation with the operator. About 46 percent of the loads audited (from a total of 910 loads audited) were unverifiable due to hauler refusal to cooperate, while 10 percent of those loads were confirmed to have originated in other jurisdictions and only 44 percent were confirmed to have originated in the unincorporated areas. The County suspects that, for the loads that were unverifiable due to hauler refusal to cooperate, the percentage of waste wrongly assigned to the unincorporated areas is much higher than for those that have been verified.

Due to the County's size, number of solid waste facilities (many of which are outside the unincorporated area and therefore, outside of the County of Los Angeles' control), the hundreds of permitted (and unpermitted) waste haulers, thousands of self-haulers, roofing contractors, landscapers, etc., and the haulers' refusal to cooperate, the County does not currently have the sole legal authority to verify all the waste allocated to the unincorporated areas.

The County has acknowledged that to document mathematical compliance with AB 939, it must do what it can at the local level to address the measurement system's deficiencies, and has already moved forward to do so. Two of the actions listed herein (overhaul the open-market system and increased reporting requirements at local landfills located in the unincorporated areas of the County) will make structural changes at the local level to improve the measurement system's accuracy. Additionally, the two other programs listed herein (the gradual implementation of automated collection and implementation of a C&D debris recycling program) will make structural changes in the waste collection and diversion system that will promote an increased level of waste diversion.

However, in addition to the above County measures, the structural deficiencies in the DRS and the CIWMB Enforcement Policy, Part II, must also be addressed to assure the County can successfully document mathematical compliance with AB 939 by the end of the Time Extension. Therefore, the County requests the CIWMB to:

1. Update the CIWMB's Enforcement Policy, Part II, last amended July 14, 2001, to incorporate the findings of the SB 2202 Report, adopted by the CIWMB on November 13, 2001.
2. Implement the recommendations of the CIWMB SB 2202 Report, including: (a) incorporating enforcement provisions in the DRS (CIWMB enforcement, penalties for hauler/facility non-compliance, etc.); (b) establishing standards for collecting waste origin information (dispatch-based allocation, cash customer information, etc.); (c) establishing due process procedures to address errors in the DRS; (d) revising regulations to make facility cooperation in DRS origin surveys a requirement of the SWFP; and (e) recognizing that the diversion rate estimate is an indicator only and not an absolute, accurate, and reliable measured value.
3. Conduct a study as called for in the SB 2202 Report to evaluate alternatives to the current measurement system, specifically to develop a menu of diversion programs (with pre-approved diversion "credits").
4. Develop additional incentives for market development (e.g., establish a State contract similar to the County's recycled-content paper procurement partnership, mandatory levels of recycled content in State purchases, etc.).
5. Provide research grants and other incentives to promote the development of conversion technologies.

Implementation by the County of the measures listed in this request, together with the steps listed above, will assist the County in documenting its mathematical compliance by the end of the Time Extension period.

Section IV A—PLAN OF CORRECTION

A Plan of Correction is required by PRC Section 41820(a)(6)(B). The plan is fundamentally a description of the actions the jurisdiction will take to meet the 50% goal by the expiration of the Time Extension.

Attach additional sheets if necessary.

Residential %		48.38%	Non-residential %		51.62%
PROGRAM TYPE Please use the Board's Program Types. The Program Glossary is online at: www.clwmb.ca.gov/LGCentral/PARIS/Codes/Reduce.htm	NEW or EXPAND	DESCRIPTION OF PROGRAM	FUNDING SOURCE	DATE FULLY COMPLETED	ESTIMATED PERCENT DIVERSION
4060-SP-CAR (Concrete, Asphalt & Rubble) and 6020-PI-ORD (Ordinance)	NEW	<p>The County has been working with stakeholders to develop a Construction and Demolition Debris Recycling Ordinance to promote the diversion of C&D waste and provide the County with documentation of the diverted tonnages. The Ordinance will require that at least 50 percent of C&D debris generated by permitted projects be recycled, and will include record-keeping requirements and penalties for failure to meet the 50 percent requirement, unless the project owner demonstrates documented good faith effort. There will be a major education/outreach effort made upon passage of the Ordinance to assure local contractors are knowledgeable of the Ordinance's requirements and are provided resources needed to comply with its provisions. The Ordinance is planned for submittal to the County Board of Supervisors to take action on before the end of 2002. Concurrent with the submittal of the Ordinance, the County plans to work with the local building industry and environmental organizations to develop the public education campaign.</p> <p>Note that the above program targets C&D activities in the private sector and is a different program from the already-implemented C&D recycling program for County-sponsored projects (established in 2001), whereby the County's Debris Recycling Specifications are incorporated into all County contracts for projects that are estimated to generate ten tons or ten cubic yards of debris (whichever is less) or more.</p> <p>Enactment and enforcement of the above Ordinance is expected to increase the County's diversion tonnages.</p>	Solid Waste Generation Service Charge (an assessment on properties in the unincorporated areas)	<p>Board of Supervisor action is anticipated before the end of 2002, followed by a six month public education campaign prior to imposition of any penalties for non-compliant projects.</p> <p>Initial program monitoring through July 2004.</p>	6 to 9%

<p>2000-RC-CRB (Residential curbside recycling) and</p> <p>3000-CM-RSG (Residential curbside greenwaste)</p>	<p>EXPAND</p>	<p>The County intends to include provisions for automated refuse, recycling, and green waste collection services in upcoming Franchises and Garbage Disposal District contracts that serve residential customers. Recently, the County incorporated automated collection requirements into the Belvedere GDD contract, which began operation July 1, 2002. The Belvedere GDD serves approximately 130,000 residents (approximately 15% of the unincorporated area's population), as well as numerous businesses.</p> <p>In addition, beginning July 1, 2001, two GDD contracts serving residential customers incorporated provisions for commingled collection and MRF processing to recover recyclable materials and green waste from the waste stream.</p> <p>Note that the County reported in its Year 2000 Annual Report the existence of six GDDs in the County. On September 2, 1997, the County issued a five-year notice to haulers operating in the Lennox area that the County intends to replace the existing open market solid waste collection system. The County is currently in the process of forming a new GDD in this unincorporated area. Subject to approval by the voters at an election to take place October 22, 2002, the Lennox GDD may be operational by July 1, 2003. This will bring to seven the total number of GDDs in the County.</p> <p>The above enhancements are expected to increase the County's diversion tonnages. The estimated percent diversion figures given include improvements due to reductions in the misallocated tonnages as the franchise system is implemented as well as increases in diversion tonnages.</p>	<p>Garbage collection and disposal services fees (an assessment on properties in each GDD)</p>	<p>Malibu GDD: 7/1/03</p> <p>Lennox GDD: 7/1/03 (tentative)</p> <p>Note that other GDDs, such as the Athens GDD, will be coming up for renegotiation after the end of Time Extension period at the end of 2004. The County intends to continue imposing these requirements in GDD contracts after 2004.</p>	<p>7 to 10% from the residential sector (based on franchise agreements and renegotiated GDD contracts in place by December 2004)</p>
<p>2030-RC-OSP (Commercial on-site pickup) and</p> <p>3020-CM-COG (Commercial on-site greenwaste)</p>	<p>EXPAND</p>	<p>The County intends to include provisions for automated refuse, recycling, and green waste collection services in upcoming Franchises and Garbage Disposal District contracts that serve commercial customers. Recently, the County incorporated automated collection requirements into the Belvedere GDD contract, which began operation July 1, 2002. The Belvedere GDD serves numerous businesses.</p> <p>In addition, beginning July 1, 2001, two GDD contracts serving commercial customers incorporated provisions for commingled collection and MRF processing to recover recyclable materials and green waste from the waste stream.</p> <p>[See the "Note" above regarding formation of the Lennox GDD.]</p> <p>The above enhancements are expected to increase the County's diversion tonnages. The estimated percent diversion figures given include improvements due to reductions in the misallocated tonnages as the franchise system is implemented as well as increases in diversion tonnages.</p>	<p>Garbage collection and disposal services fees (an assessment on properties in each GDD)</p>	<p>Malibu GDD: 7/1/03</p> <p>Lennox GDD: 7/1/03 (tentative)</p> <p>Note that other GDDs, such as the Athens GDD, will be coming up for renegotiation after the end of Time Extension period at the end of 2004. The County intends to continue imposing these requirements in GDD contracts after 2004.</p>	<p>9 to 12% from the commercial sector (based on franchise agreements and renegotiated GDD contracts in place by December 2004)</p>

	Total Estimated Diversion Percent From New and/or Expanded Programs	22 to 31%
	Current Diversion Rate Percent From Latest Annual Report	30%
	Total Planned Diversion Percent Estimated	52 to 61%

PROGRAMS SUPPORTING DIVERSION ACTIVITIES

PROGRAM TYPE	NEW or EXPANDED	DESCRIPTION OF PROGRAM	DATE FULLY COMPLETED
<p>2000-RC-CRB (Residential curbside recycling) and</p> <p>2030-RC-OSP (Commercial on-site pickup) and</p> <p>3000-CM-RSG (Residential curbside greenwaste) and</p> <p>3020-CM-COG (Commercial on-site greenwaste)</p>	NEW	<p>Implement on a phased-in basis across the unincorporated areas (outside the GDDs and the Lennox area) a franchise system, as described in the Solid Waste Collection System Options Analysis Report, dated February, 2001, and approved by the County Board of Supervisors on May 22, 2001. This will occur after the end of the five-year notice issued by the County on June 16, 1998, to haulers serving those areas, that the County intends to replace the existing open market solid waste collection system. Implementation of franchises will be conducted in phases and include most of the County by the end of the Time Extension.</p> <p>The franchise system will allow the County to document diversion and disposal tonnages and establish a uniform level of service, such as container sizes, and where feasible, automated collection and/or MRF processing.</p>	To be phased in over a two-year period beginning July 2003 (tentative)
7010-FR-LAN (Landfill)	NEW	Implement (via new provisions added to land use permits as the facilities come forward in 2002 and 2003 seeking new or revised permits) measures at two landfills located in the County unincorporated areas (namely Sunshine Canyon and Puente Hills Landfills) that will enhance the County's ability to obtain information needed to verify the accuracy of DRS waste origin data for the unincorporated areas. Eventually, similar provisions will be required of all disposal facilities and other solid waste facilities (such as transfer stations and MRFs) as opportunities to amend their land use permits become available.	July 2004 (tentative)

Section V – PARIS

Office of Local Assistance staff will be reviewing your Jurisdiction's Planning Annual Report Information System (PARIS) database printout as part of the evaluation of your request. Should the Jurisdiction have updates or revisions to the program implementation from the latest Annual Report submitted to the Board, please attach to the application the Jurisdiction's PARIS database printout showing updates or revisions.

Contact your Office of Local Assistance Representative at (916) 341-6199 for a copy of PARIS, or go to the Board's website at www.ciwmb.ca.gov/LGCentral/PARIS/.